



RED NOSE PRIVACY POLICY

1. INTRODUCTION

Red Nose takes its privacy obligations seriously. The organisation handles all Personal Information in accordance with the Australian Privacy Principles ("APPs") contained in the Privacy Act 1988 (Cth) ("the Act"), and other applicable State and Territory privacy laws.

In this Privacy Policy, references to "Red Nose", "we", "us" and "our" are Red Nose Limited (ABN 81 462 345 159). References to "you", "your" and "yours" are to our employees, volunteers, customers and third parties.

If you have any questions about the Policy, or the application of the Policy to you, please contact the Red Nose Privacy Officer, whose details are set out in section 10.

We will review and update this Privacy Policy from time to time. Any changes to our policy will be published on our [website](#). You may obtain a copy of our current Privacy Policy from our website or by contacting us using the contact details below.

2. PURPOSE

This Privacy Policy ("Policy") explains how Red Nose collects, handles and uses Personal Information. It provides information for any person who has questions about how the organisation handles their Personal Information.

3. SCOPE

The Policy applies to all Personal Information collected by Red Nose (including its employees; both permanent and casual, contract workers and volunteers responsible for the collection of Personal Information during their engagement with Red Nose) howsoever collected and to all activities undertaken in the name of Red Nose.

4. DEFINITIONS

For the purposes of the Policy: "Personal Information" has the meaning given to it in the Act. It means information or an opinion about an identified individual, or an individual who is reasonably identifiable. It includes information or opinion:

- (a) whether the information or opinion is true; and
- (b) whether the information or opinion is recorded in a material form or not.

"Sensitive Information" also has the meaning given to it in the Act. It means a type of Personal Information about an individual including their racial or ethnic origin, political opinions, membership of political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, health information, criminal record, sexual orientation or practices, genetic or certain biometric information. This definition includes both sensitive information that is provided to Red Nose:

- (a) in response to a specific request for such information by Red Nose; and
- (b) without a specific request for the disclosure of such information (i.e. sensitive information that is voluntarily disclosed to Red Nose).

5. POLICY

The following principles form the basis of this Policy:

- (a) the right to privacy of people bereaved by the death of a baby or child, their families and all people who receive a service from Red Nose or provide information to Red Nose, shall be ensured;
- (b) Personal Information in any form shall be managed with diligence, and, where relevant, confidentiality issues will be explained in detail; and
- (c) Red Nose will be open and accountable about how Personal Information is handled.

6. PROCEDURES / GUIDELINES

6.1 Use and disclosure of information

In general, Red Nose will only use or disclose your Personal Information for the primary purpose for which the information was collected. We have outlined these purposes for which we collect your Personal Information at section 6.6.

If Personal Information is proposed to be used for a purpose other than the primary purpose ("secondary purpose") then:

- (a) in the case of Sensitive Information, Red Nose will obtain your prior consent to use that Sensitive information for the secondary purpose and will de-identify that Sensitive information upon receiving your consent;
- (b) in the case of other types of Personal Information, where practical Red Nose will obtain your prior consent to use that Personal Information for a secondary purpose, and will de-identify that Personal Information wherever possible; and
- (c) where we have not obtained your consent, we will only use the Personal Information for the secondary purpose where we are specifically permitted to do so under the Privacy Act, for instance, in relation to legal proceedings or where disclosure is required by law.

Red Nose may also use and disclose your Personal Information as requested or directed by you.

6.2 Kinds of Personal Information

The kinds of Personal Information that Red Nose may collect and hold in accordance with this Policy includes:

- identifying information, e.g. name and date of birth;
- details of the products and/or services accessed or provided to an individual;
- information about how products and services provided by Red Nose are used by individuals;
- records of Red Nose's interactions with individuals;
- contact information, e.g. address, email and telephone number(s);
- financial information, e.g. credit card, bank account or other payment details;
- technical data, which may include the individuals' IP addresses, locations or activities, the types of devices you are using to access our websites, device attributes, browser type, language and operating system;

- social media handles and other social media profile information made available to Red Nose or to the public;
- occupational and employment details including employment status and any previous work experience;
- information from or in connection with your resume or job application if you apply for a position with us;
- information provided to us via customer surveys;
- photographs or images of you; and
- the location from which you have come to our website and the pages you have visited.

6.3 How does Red Nose collect Personal Information?

Red Nose will collect and hold your Personal Information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your Personal Information directly from you.

Red Nose will collect Personal Information from:

- individuals engaging with us and/or our services;
- employees;
- job applicants;
- the general public (such as visitors to Red Nose website and social media channels);
- third parties, including Red Nose professional marketing and fundraising contractors; and
- publicly available sources or information.

We may collect this information when you communicate with us through the Websites, by telephone, by e-mail, in-person or through a written application. In some circumstances the collection of Personal Information may be required by law.

Specifically, we may collect your Personal Information when you:

- seek and/or accept assistance from Red Nose;
- receive Red Nose products or services;
- donate or fundraise for Red Nose;
- become a peer supporter or volunteer;
- provide Red Nose with products or services;
- provide products or services on behalf of Red Nose;
- submit a query or request to Red Nose;

- participate in programs or events run or supported by Red Nose;
- access the Red Nose website, social media, or mobile applications; or
- respond to a Red Nose survey or fill in a Red Nose form.

6.4 Collection of Sensitive Information

Red Nose may also collect Sensitive Information about you, such as health information. Red Nose will seek your consent to the collection, use and disclosure of that information at the time of collection.

6.5 The kinds of Sensitive Information that Red Nose may collect and hold in accordance with this Policy include information about individuals' health, wellbeing and support needs, and those of their family members relevant to the provision of services by Red Nose.

Red Nose will take reasonable steps to ensure that the information it collects, uses, retains or discloses is accurate, complete, up to date and relevant to its functions or activities.

6.6 Purposes for collection, use and disclosure of information

Red Nose will provide you with details about the reason for the collection of Personal Information at the time of collection, as well as any other specific matters that are relevant to the collection of that information.

Depending on your circumstances at the time that information is collected, Red Nose will collect and use Personal Information in accordance with this Policy for the purposes of enabling Red Nose to:

- determine the suitability of Red Nose bereavement services for you and your family;
- provide counselling and bereavement support services to you and your family;
- complete an assessment of the bereavement services while the services are being provided to ensure that they are effective and safe;
- provide safe sleeping and safe pregnancy advice;
- manage Red Nose's continuing relationship with you, which includes confirming your identity, responding to any queries or requests you may have and contacting you for follow-up purposes;
- raise funds (e.g. through direct fundraising, administering monthly donation programs, and bequests);
- analyse the use of products and services provided by Red Nose;
- complete quality assurance activities, including through working with third parties;
- provide education and training, both internally and externally (e.g. to Red Nose staff and other organisations);
- provide you with details of Red Nose activities, which includes newsletters and electronic communications;

- manage and develop Red Nose business and operational processes and systems;
- manage and resolve any legal or commercial complaints or issues;
- comply with any legal obligations of Red Nose;
- understand the use and personalise user experience of the Red Nose website and social media channels;
- monitor the Red Nose website and social media channels statistics;
- perform any other functions and activities relating to the Red Nose business;
- send support and administrative messages, reminders, technical notices, updates, security alerts, and information to you;
- send marketing and promotional messages to you and other information that has been requested, or which may be of interest;
- process any application submitted by you;
- respond to any queries or complaints you have made; and
- assist government and law enforcement agencies or regulators.

We will not use or disclose your Personal Information for any other purpose unless we notify you of that intention via a further collection notice.

6.7 Identifiers

Red Nose shall only use details which identify your Personal Information where it is necessary to carry out its functions.

6.8 Anonymity and Withholding Personal Information

When providing Red Nose with Personal Information, you will have the option of remaining anonymous or providing a pseudonym. However, if you choose not to provide the Personal Information requested, Red Nose may be unable to provide you with:

- Red Nose bereavement support;
- Red Nose advice or training services;
- responses to your queries or requests; or
- in the case of donations, issue a tax-deductible receipt.

6.9 Direct Marketing

Red Nose may use Personal Information to send individuals marketing materials about products or services that may be of interest to them.

If you have opted to receive updates from us via emails, letters, texts or other methods, we will use your Personal Information to offer you such marketing material, but we will not do so if you

tell us not to. These products and services may be offered by us, our other business partners or our service providers.

Individuals can opt-out of receiving these marketing communications at any time by contacting the Red Nose Supporter Team on 1300 998 698 or emailing fundraising@rednose.org.au.

If you are a client, you agree and acknowledge that even if you opt out of receiving marketing material, we will still send you essential information that we are legally required to send you relating to the services we provide. Once you opt out of receiving marketing material from us, you agree and acknowledge that this removal from our distribution lists may take several business days after the date of your request to be removed.

6.10 People to whom Red Nose discloses Personal Information

Red Nose will be authorised to share your Personal Information with another person upon receiving a written request or written consent from you to share your Personal Information. Red Nose will only share your Personal Information in accordance with that written request or consent. In addition to specific consents or requests, Red Nose will ask for your permission to share your Personal Information at the time of collection and will provide you with Red Nose's reasons for sharing your Personal Information.

Red Nose may, in accordance with this Policy and your request or consent, share your information with:

- third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisers, where permitted by law;
- to external service providers so that they may perform services for us or on our behalf or to assist us in providing our programs, events and services or to administer our business;
- Red Nose staff, contractors, and volunteers, each on a 'need-to-know' basis;
- other persons authorised by or responsible for you, e.g. your employer when participating in a Red Nose training program;
- Red Nose's business partners, agents, professional advisors, and service providers (including health service providers, translators, interpreters and other third parties Red Nose works with or engage, to provide the services);
- your representatives and advisers;
- government agencies (e.g. such as those from whom Red Nose receives funding);
- universities and research organisations;
- payment system operators and financial institutions; and
- other parties as authorised or required by law.

When we disclose Personal Information to third parties, we make all reasonable efforts to ensure that we disclose only relevant information and that it is accurate, complete and up to date and that the third party will comply with the Privacy Act in relation to the use, disclosure and storage of your information.

6.11 Transfer or closure of the Organisation

If Red Nose is sold, transferred, closed down or amalgamated and Red Nose continues to hold your Personal Information, it will take reasonable steps to inform you of how that information will be held and dealt with, including any steps to destroy or de-identify your Personal Information.

6.12 Transfer to another health provider

In the event that you wish to transfer to another health care provider, upon receipt of a written request from you, Red Nose will provide the new provider with a copy or written summary of your health care information. The written request must contain:

- sufficient information concerning your identity to enable Red Nose to determine the relevant information to be provided;
- details of the new provider; and
- details of the privacy officer of the new provider.

Red Nose will provide you with a confirmation once this summary has been provided.

6.13 Disclosure of Personal Information outside Australia

From time to time, Red Nose may need to disclose your Personal Information to a third party located overseas for a purpose set out in the Policy. The countries in which those third party recipients may be located are: United States, United Kingdom, New Zealand, Canada, Singapore, India, and the Philippines.

If such disclosure is required, Red Nose will disclose that Personal Information only to the extent necessary and otherwise in accordance with this Policy. Red Nose will take reasonable steps to ensure that the third party handles Personal Information in accordance with Australian privacy laws.

If you do not want us to disclose your information to recipients outside of Australia, please let us know.

6.14 Other permitted disclosures

We may disclose Personal Information in other circumstances, where the person concerned has consented to the disclosure, or where we are expressly permitted to do so by the Privacy Act or another law. These other disclosures may include where:

- you would reasonably expect the disclosure to occur (for example, quality assurance purposes or training);
- we are authorised or compelled by law to disclose;
- it will prevent or lessen a serious threat to someone's life, health or safety or a threat to public health or safety;
- it is necessary as part of the establishment or defence of a legal claim;
- it is requested by an enforcement agency such as the police; or
- it is a necessary part of an investigation following a complaint or incident.

6.15 Information collected via our website

This Privacy Policy applies to the Personal Information that Red Nose collects through the following websites:

- <https://rednose.org.au/>; and
- any other websites owned or operated by Red Nose from time to time (together, the **Websites**).

6.16 Third Party websites

The Websites may link to other websites which are outside our control, and other websites outside our control may link to the Websites. Whilst we try to ensure that we link only to websites which share our privacy and security standards, once you have left any of the Websites, we cannot be responsible for the protection and privacy of any information which you provide on other websites. You should exercise caution and review the privacy statement applicable to the website in question.

6.17 Storage and security of information

Red Nose will take all reasonable steps to protect the information it holds from misuse and loss and from unauthorised access, modification or disclosure. Red Nose stores collected Personal Information:

- in electronic databases (which may be held on behalf of Red Nose by third party data storage providers); and
- in hard copy records (which may be in physical storage facilities operated by third parties on behalf of Red Nose).

Red Nose uses physical and technological security measures to protect the confidentiality and security of that information held, which are regularly updated to address new and emerging security threats. For example, upon collection of Sensitive Information such as health information:

- it is stored securely (both physically and electronically); and
- access is provided only to Red Nose personnel who need to use this information.

In general, we implement and maintain processes and security measures to protect Personal Information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure. This also applies to disposal of Personal Information. This includes:

- training our staff in how to keep your information safe and secure;
- conducting privacy impact assessments;
- restricting access to Personal Information to only those who need access to the Personal Information to do their job;
- implementing physical, electronic and managerial procedures to safeguard the security and integrity of your Personal Information
- storing your hard copy and electronic records in secure systems; and
- using trusted contracted service providers (including cloud storage providers).

However, we advise that there are inherent risks in transmitting information across the internet, including the risk that information sent to or from a website may be intercepted, corrupted or modified by third parties. If you have security concerns or wish to provide Personal Information by other means (e.g. by telephone or paper), you may contact us using the contact details set out at the bottom of this Privacy Policy.

Where information is provided to Red Nose, subject to any authorisation or requirement at law, it will:

- (a) be held in accordance with this Policy for seven years; and
- (b) not be deleted, prior to the expiration of the seven-year retention period, during which time it may be accessed by you or Red Nose in accordance with this Policy.

Red Nose will only keep your Personal Information for as long as required and for the purposes described in this Policy and in privacy and health records legislation. If the information we store is no longer required by us for any purpose for which it was collected or for which we are otherwise entitled to retain it and is no longer required by law to be retained by us, we will destroy or de-identify the information.

6.18 Notifiable Data Breaches

As an agency regulated under the Act, Red Nose is required to notify affected individuals and the Office of the Australian Information Commissioner ("OAIC") when a data breach is likely to result in serious harm to individuals whose Personal Information is involved in the breach. Red Nose will comply with all requirements and processes under the Act and as outlined on the OAIC website to fulfil its obligations if such circumstances occur.

If we experience a security breach where your Personal Information is lost, stolen, accessed, used, disclosed, copied, modified or disposed of by any unauthorised person or in an unauthorised manner, we will notify you as soon as reasonably possible. If you reasonably believe that there has been unauthorised use or disclosure of your Personal Information, you can also access relevant information on the OAIC website or contact Red Nose's Privacy Officer, whose details are set out in section 10.

6.19 Access and correction

You may wish to access, correct or update some or all of your Personal Information held by Red Nose. If so, you will need to contact the Red Nose Privacy Officer, whose details are set out in section 8. If you wish to have your Personal Information deleted, please contact us and we will take reasonable steps to delete it unless we need to keep it for legal, auditing or internal risk management reasons.

There is no charge for requesting access to your Personal Information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

To ensure that only your information is accessible, Red Nose will require you to provide information to allow Red Nose to confirm your identity. In some cases, Red Nose may not be able to provide you with information in response to a request to access or update your information. This could happen if, for example, it would place you at risk of harm, interfere with the privacy of others or result in a breach of confidentiality. In these cases, Red Nose will provide you with the written reasons why it cannot comply with your request.

If we refuse to correct or update your information, you may request that we make a note on your record that you are of the opinion that the information is inaccurate, incomplete, out of date, irrelevant or misleading, as the case may be.

6.20 Queries and complaints

Red Nose aims to always meet the highest standards to safeguard your privacy. If you are concerned about the way in which Red Nose manages their Personal Information, or want to discuss this Policy, please contact Red Nose's Privacy Officer using the contact details set out in section 10.

Red Nose will keep records of all complaints or queries and aim to deal with all matters as soon as possible. We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

In addition to contacting Red Nose's Privacy Officer, you are also entitled under the Act to make a complaint to the OAIC, especially if Red Nose has not responded to you within a reasonable time or if you feel that your complaint has not been satisfactorily resolved. Details of the OAIC contact person may be found here: <https://www.oaic.gov.au/about-us/contact-us>.

7. POLICY REVIEW

Red Nose will review this policy annually or otherwise as required to account for changes to standard practices and procedures or changes in law. The latest version of this Policy will always be available on the Red Nose website.

8. RED NOSE PRIVACY OFFICER

Privacy Officer, Red Nose Australia
Suite 2/2 Domville Ave, Hawthorn VIC 3127
Tel: 1300 998 698
Email: info@rednose.org.au

9. DESIGNATED RESPONSIBILITY

POLICY AUTHORISATION: Chief Executive Officer

POLICY IMPLEMENTATION:

POLICY OWNER:

10. FURTHER INFORMATION ON THE PRIVACY POLICY

For further information on this policy, please contact the Red Nose Privacy Officer

11. DOCUMENT HISTORY

Version	Prepared/ reviewed by (name):	Reference and detail of changes	Approved by	Approval date
2	A Hutchins	Updated following review by Landers & Rogers	A&R recommended 22.05.25 Board Approved	28 th May 2025
1		New policy	Board	26/09/2019

